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Attorneys of Record for Plaintiff
Eileen M. Burger (EB-3002)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DR. SUZAN M. RUSSELL,

Plaintiff,

-against-

NEW YORK UNIVERSITY, ROBERT SQUILLACE,
individually and in his capacity as Associate Dean for
Academic Affairs, Liberal Studies, JOSEPH M. THOMETZ,
individually, and EVE MELTZER, individually,

Defendants.
-----X

Case No.: 15-cv-2185
(GHW)(RLE)

**NOTICE OF MOTION
FOR LEAVE TO
WITHDRAW AS
COUNSEL FOR THE
PLAINTIFF**

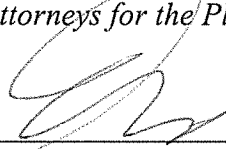
TO ALL PARTIES AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE, that upon the declarations of Mitchell B. Pollack, Esq. and Eileen M. Burger, Esq. and the accompanying Memorandum of Law, all filed under seal, counsel for the Plaintiff will move this Court on a date and time to be set by the Court, before the Hon. Gregory H. Woods, U.S.D.J., at the United States District Courthouse, 500 Pearl Street, New York, NY, for an Order: 1) pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and Rules 1.16(b)(3) and (c)(12) of the Rules of Professional Conduct, permitting counsel for the Plaintiff to withdraw as attorney of record; 2) granting a stay of the proceedings to afford the Plaintiff adequate time to obtain new counsel; 3) granting a retaining lien on the Plaintiff's file and the documents/materials in

counsel's possession for outstanding fees owed; 4) granting a charging lien on any recovery in this action by the Plaintiff, the monetary value of which to be determined by this Court, at a hearing on a later date, including the costs and reasonable attorneys' fees associated with this motion; and 5) such other and further relief as the Court deems just and proper.

Dated: October 7, 2015
Tarrytown, NY

MITCHELL POLLACK & ASSOCIATES, PLLC
Attorneys for the Plaintiff, Dr. Suzan M. Russell


By.: Eileen M. Burger (EB-3002)
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